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May 13, 2003

Honorable J. Frederick Motz United States District Court for the District of Maryland 101 West Lombard Street Baltimore, Maryland 21201

Re: Judith Nixon v. Toyota Motor Sales, U.S.A., Inc., et al.

Civil Action No. JFM-03-327

Dear Judge Motz:

Counsel in this matter have conferred concerning the current Scheduling Order issued by the Court on March 3, 2003 and agree that because of the complexity of this case and the schedules' of all counsel, we believe that it would be difficult to complete the discovery and time for designation of experts by the dates presently scheduled by the Court, and accordingly request that the schedule be modified. The following is a proposed amended schedule:

Plaintiff's Rule 26(a)(2)	June 13, 2003

disclosures re experts

Defendant's Rule 26(a)(2)

August 13, 2003

disclosures re experts

Plaintiff's rebuttal Rule 26(a)(2)

August 27, 2003

disclosures re experts

Rule 26(e)(2) supplementation of September 3, 2003

Disclosures and responses

Discovery deadline; October 1, 2003

submission of status report

Requests for admission October 8, 2003

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Dispositive pretrial motions deadline

October 29, 2003

We appreciate your cooperation in this matter.

Sincerely yours,

 $\frac{/S/}{\text{Peter J. Sommer}}$

PJS:dcb

cc: Jeffrey Yeatman, Esquire (via e-mail) Thomas Dolina, Esquire (via e-mail) Peter Basile, Esquire (via e-mail)